

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	CHAPTER 13
<b>CRAIG BRADLEY DEIMLER</b>	:	
<b>WILLIAM OLIVER FISHER-DEIMLER</b>	:	CASE NO. 1:20-bk-00841
aka William Oliver Fisher Deimler; fka	:	
William Oliver Fisher	:	
Debtors	:	
	:	
<b>MID PENN BANK,</b>	:	
Movant	:	
	:	
v.	:	
	:	
<b>CRAIG BRADLEY DEIMLER</b>	:	
<b>WILLIAM OLIVER FISHER-DEIMLER</b>	:	
aka William Oliver Fisher Deimler; fka	:	
William Oliver Fisher,	:	
Respondents	:	

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
  - A. Admitted.
  - B. Admitted.
6. Admitted..
7. Admitted.
8. Admitted as to Mid Penn's intention to bring a foreclosure action against BFCD; denied that  
Movant is entitled to relief.
- 9.

A. This paragraph constitutes a legal conclusion to which no response is required. To the extent and answer is required, this averment is denied.

B. This paragraph constitutes a legal conclusion to which no response is required. To the extent and answer is required, this averment is denied. The Debtors are the partners in BFCD and their interest in BFCD is property of the bankruptcy estate.

10.

A. Movant is protected by an equity cushion and this averment is therefore denied.

B. Movant is protected by an equity cushion and this averment is therefore denied. The property is the Debtors' home and is essential to the reorganization.

C. This paragraph constitutes a legal conclusion to which no response is required. To the extent and answer is required, this averment is denied.

D. Debtors' plan provides for regular monthly payments to Mid Penn and payment of arrearages and this averment is therefore denied.

E. Proof that Movant will suffer irreparable harm is demanded at trial and this paragraph is therefore denied.

WHEREFORE, the Debtors respectfully request that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

---

Dorothy L. Mott, Esquire  
Mott & Gendron Law  
Attorney ID # 43568  
125 State Street  
Harrisburg, PA 17101  
(717) 232-6650 TEL  
(717) 232-0477 FAX  
doriemott@aol.com